**Gregory Ackers** 

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# UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF CALIFORNIA

CASE # 2:24-cv-04145-PSG-AJR

# PLAINTIFFS MOTION TO AMEND ORIGINAL COMPLAINT

**GREGORY ACKERS** 

Plaintiff

٧.

UNIVERSITY OF CALIFORNIA

**BOARD OF REGENTS** 

Defendant(s)

#### PROCEDURAL POSTURE

In re; Rule 15(a) of FRCP &,in acting as the original Civil Complainant & in response to Judge Gutierrez's DISMISSAL WITHOUT PREJUDICE of the above-named lawsuit,I make motion to the Dist. to allow AMENDMENT of 1st Complaint. In re; my Amended Complaint,I intend to modify my STANDING in order to act as a Qui Tam WHISTLEBLOWER. 31 USC-Sec. 3729 of The Federal False Claims Act is allowable in U.S. Dist. Courts to counter FRAUD & MALFEASANCE in re; Federal Govt Contracts. My Original Complaint took to task Dft U of California's violation of its own agreements with The Dept. of Education, when it abetted the Civil Rights of its Jewish pupils.

## SUMMARY OF ARGUMENT

I hereby represent to the Dist. that my Amended Complaint will serve to continue my case v. the Dfts egregious & corrupt violation of American educational & civil discourse. My Amendment will NOT prejudice the existing parties, will, certainly, further the interests of American justice.

 $\label{eq:memorandum} \begin{tabular}{l} MEMORANDUM IN SUPPORT OF PLTF MOTION FOR LEAVE TO AMEND COMPLAINT \\ PURSUANT TO FRCP 15(a) \& Hon. Gutierrez' Dismissal, I, the Pltf, respectfully submit this Memorandum. \\ \end{tabular}$ 

## STATEMENT OF FACTS

The University of California is mandated to comply with & enforce the laws of the U.S. & protect the civil rights of its own student body. During the spring & summer of 2023, the Dft contravend their duty by allowing racist thugs to blockade its campus-grounds against the free movement of UCLA students between academic buildings.

#### ARGUMENT

The efficient administration of justice mandates that the Pltf shall be given LEAVE TO AMEND A COMPLAINT. FRCP 15(a) requires that "leave to amend complaints be freely-given when justice requires". Dfts will not suffer substantial prejudice, there's no other reason Pltfs shall NOT be given leave for Amendment.

# CONCLUSION

For above reasons, in acting as Pltf, I make MOTION FOR LEAVE TO FILE AMENDED COMPLAINT.

Respectfully submitted on this day of Aug. 12,2024

Gregory Ackers Mu avan



